

Filed in Washington District Court

*** EFILED ***

Case Number: D29CI210000058

Transaction ID: 0012986478

Filing Date: 03/21/2021 11:56:53 PM CDT

IN THE DISTRICT COURT OF WASHINGTON COUNTY, NEBRASKA

ANGELA FINGER,

Plaintiff,

vs.

BILFINGER INC.,

Defendant.

Case No. _____

**COMPLAINT AND JURY
DEMAND**

COMES NOW the Plaintiff, by and through her attorneys, and for her cause of action against the Defendant hereby states the following:

PARTIES-VENUE-JURISDICTION

1. Plaintiff ANGELA FINGER, is a resident of Ball, Rapides Parish, Louisiana.
2. Defendant BILFINGER INC., is a foreign corporation authorized to conduct business in Nebraska and doing business in Blair, Washington County, Nebraska.
3. This Court has original jurisdiction over the claims arising under state law and concurrent jurisdiction of the Federal law claims.
4. Venue is appropriate in this District under Neb. Rev. Stat. §25-403.02. Defendant resides in Washington County and the acts about which Plaintiff complains occurred during the course of her employment in Douglas County, Nebraska.
5. On or about December 22, 2020, less than 90 days prior to the filing of this Complaint, Nebraska Equal Opportunity Commission made a determination with respect to Plaintiff's charges, NEB 1-18/19-3-50312-RS.
6. On or about February 19, 2021, less than 90 days prior to the filing of this Complaint, Plaintiff received a Notice of Right to Sue from the U.S. Equal Employment Opportunity Commission on charge number 32E-2019-00331.

FACTUAL BACKGROUND

7. On or about May 14, 2018, Plaintiff began working for Defendant as a Materials/Safety Manager.

8. Throughout Plaintiff's employment with Defendant, she was harassed by her Supervisor, Robert Hicks ("Hicks"):

- a. During her employment, Plaintiff was aware of two Native American males who worked for Defendant getting into a physical fight. Hicks said to Plaintiff, "that's the way Indians do, that's the way your people fight."
- b. Hicks would call Plaintiff "bluegum", and told Plaintiff that was "a mix of a nigger and an Indian."
- c. Hicks called Plaintiff a "squaw," which is a derogatory name for a Native American woman, during a conversation there were having.
- d. Hicks told Plaintiff she was not a true Indian, because Indians don't have big boobs and blonde in their hair.

9. Hicks' comments regarding Native Americans, Plaintiff's sex and Plaintiff's ethnicity and color continued until Plaintiff's termination.

10. In June 2018, Plaintiff complained to Safety Managers, Wesley Buckland ("Buckland") and Terry Hager ("Hager") about Hicks' racist and sexist comments towards her and others. The comments by Hicks towards Plaintiff ceased briefly, and then restarted shortly thereafter.

11. Towards to the end of June 2018, Plaintiff also spoke with Regional Safety Directors Michael Cooper ("Cooper") and Kaleb Harris ("Harris") about Hicks' racist and sexist

comments. When Plaintiff spoke about Hicks, Cooper stated they had received multiple complaints about him and they would be talking to him.

12. In or around July 2018, after Plaintiff made the complaints, Hicks stated that someone had complained about him and he wanted to know who it was during an employee safety meeting. During the comments, Hicks was staring at Plaintiff.

13. After Plaintiff complained about him, Hicks started to retaliate against Plaintiff by adding duties to her job and treating her differently than other employees. Hicks made Plaintiff come in every morning at 5:30 am to coordinate the parking lot, and check the portable bathrooms for company rule violations. Plaintiff also became responsible for ensuring that no one was smoking in the portable bathrooms. Plaintiff was no longer allowed to take a lunch break because she was made responsible for monitoring co-workers' break times.

14. The other Material/ Safety Manager, Dave Larson ("Larson"), was not required to do any of the same extra duties Plaintiff was required to do.

15. Plaintiff continued to perform the extra duties for fear of insubordination until her termination.

16. In September 2018, Hicks announced that everyone at the site Plaintiff was working at got a raise of two dollars per hour. Plaintiff was the only one who did not receive the raise.

17. During a mandatory meeting of all employees, Hicks said to the group, "Angela, that raise they were talking about does not apply to you. You make too much money as it is."

18. On October 1, 2018, Plaintiff sustained a workers' compensation accident which she reported Hager that same day.

19. On or about October 5, 2018, Plaintiff arrived to the job site for work and Welder Julian Chavez ("Chavez") hugged Plaintiff and stated he messed up the previous night, but everything was fine now.

20. Plaintiff asked Timekeeper, Michelle Fridley ("Fridley") what happened the previous night, but she did not disclose anything. Then Fridley's daughter, Amanda Wyble ("Wyble") stated that Chavez came to work inebriated and almost raped Fridley at work.

21. Hicks was the supervisor for the night. He knew about Chavez working while drunk and what happened with Fridley, but took no action.

22. Immediately after Plaintiff spoke with Amanda, she met with Hager and told him what happened the previous night. Plaintiff told Hager that it was her duty to report the incident since Defendant broke the law by letting Chavez work while inebriated and because Fridley was assaulted. Hager told Plaintiff nothing could be done, unless Fridley made the complaint herself. Plaintiff suspected that Fridley did not want to make a complaint because she was in a relationship with Hicks, and knew it would hurt his employment with Defendant.

23. When Plaintiff complained about the rule violations and the sexual assault to Site Manager Dave Hoff ("Hoff"), he told Plaintiff if she could not prove Fridley and Hicks were in a relationship, he did not want to hear her complaints.

24. Over the next few days, Hicks retaliated against Plaintiff by assigning her even more job duties that were not within her job description, and threatening to fire her for mistakes that she allegedly made. Additionally, Hicks and other employees started to ignore and shun Plaintiff while she was on the job site.

25. On October 6, 2018, Plaintiff complained to Hager that she was being retaliated against by Hicks, and feared further retaliation by him if something wasn't done.

26. On October 6, 2018, Plaintiff reported her workers' compensation accident again; this time telling Kayla Despres, Senior Human Resources. In the same email, Plaintiff also complained to Despres that she was subjected to a hostile working environment and treated differently than other employees on account of her race and sex. Plaintiff also complained to Despres that she was retaliated against by Hicks, and feared further retaliation by him if something wasn't done. Plaintiff also complained to Despres about several violations of rules and laws on the job site.

27. On October 10, 2018, Plaintiff sent another written email complaint to Despres that as a result of her complaints about Hicks, her schedule had been reduced by three hours a day, 21 hours over a week's time, for the purpose of Plaintiff avoiding contact with Hicks.

28. On October 11, 2018, Plaintiff was terminated and told that Defendant was just going to do a reduction in force so that she could draw unemployment and they wouldn't have to worry about the problems between her and Hicks.

29. Thereafter, Plaintiff applied for several open positions with Defendant on other job sites. Plaintiff was qualified for the positions she applied for, and was not rehired by Defendant even though she was told that she would be eligible for rehire.

30. Prior to termination, Plaintiff's job performance was above satisfactory.

31. At the time of her termination, Plaintiff was earning approximately \$1,633.68 per week, working over 40 hours a week for Defendant. As of the date of this filing, Plaintiff's lost wages resulting from Defendant's wrongful conduct are in excess of \$23,000.00 and are continuing. As part of her compensation, Plaintiff also was receiving health insurance and retirement benefits in an amount that is currently unknown to Plaintiff and will be subject to further discovery.

32. As a result of Defendant's wrongful conduct, Plaintiff suffered lost wages, front pay, punitive damages, compensatory damages, including emotional pain, suffering, inconvenience, mental anguish, loss of enjoyment of life, and has also incurred attorney's fees and other costs that are continuing.

COUNTS I AND II

SEX DISCRIMINATION-DISPARATE TREATMENT

42 U.S.C. §§2000(e) et seq. and Neb. Rev. Stat. §48-1004

33. Plaintiff hereby incorporates paragraphs 1 through 32 as if fully set forth herein and states:

34. Defendant discriminated against Plaintiff with respect to terms and conditions of her employment on the basis of her sex in violation of the Title VII of the Civil Rights Act of 1964, as Amended ("Title VII"), and the NEFEPA by treating her differently than similarly-situated male co-workers.

35. Plaintiff suffered adverse action, including but not limited to unequal pay, unfavorable work assignments, discipline and termination.

36. Plaintiff's sex was a motivating factor in the decision-making regarding Plaintiff's terms and conditions of employment.

37. The unlawful employment practices complained of above were malicious or recklessly indifferent to Plaintiff's rights as protected by Federal law, and by its conduct Defendant is subject to punitive damages.

38. As a result of Defendant's acts and omissions, Plaintiff has in the past and will in the future suffer damages including, but not limited to, mental and emotional distress; fear;

anguish; humiliation; embarrassment; lost enjoyment of life; lost wages, benefits, front pay, and other emoluments of employment.

COUNTS III AND IV

SEX DISCRIMINATION-HOSTILE WORK ENVIRONMENT

42 U.S.C. §§2000(e) et seq. and Neb. Rev. Stat. §48-1004

39. Plaintiff hereby incorporates paragraphs 1 through 38 as if fully set forth herein and states:

40. Defendant discriminated against Plaintiff with respect to her employment on the basis of her sex in violation of the Title VII and the NEFEPA by subjecting her to a hostile work environment caused by the conduct of her supervisor, including but not limited to Hicks's comments about Plaintiff's body, use of sexually derogatory terms towards her and other women, use of sexually explicit language towards her and other women and his sexual relationship with another employee

41. Hicks' conduct was unwelcome.

42. Hicks' conduct was based on Plaintiff's sex/gender.

43. Hicks' conduct was sufficiently severe or pervasive that a reasonable person in the plaintiff's position would find the plaintiff's work environment to be hostile.

44. At the time such conduct occurred and as a result of such conduct, Plaintiff believed her work environment to be hostile.

45. As a result of Defendant's acts and omissions, Plaintiff has in the past and will in the future suffer damages including, but not limited to, mental and emotional distress; fear; anguish; humiliation; embarrassment; lost enjoyment of life; lost wages, benefits, front pay, and other emoluments of employment.

COUNTS V & VI

RACE/COLOR DISCRIMINATION

42 U.S.C. §2000e and Neb. Rev. Stat. §48-1004

46. Plaintiff hereby incorporates paragraphs 1 through 45 as if fully set forth herein and states:

47. Defendant discriminated against Plaintiff with respect to terms and conditions of her employment on the basis of race and/or color in violation of Title VII and the NEFEPA by treating her differently than similarly-situated co-workers who were Caucasian and/or white.

48. Plaintiff suffered adverse action, including but not limited to unequal pay, unfavorable work assignments, discipline, and termination of employment.

49. Plaintiff's race and/or color were a motivating factor in the decision-making regarding Plaintiff's terms and conditions of employment.

50. The unlawful employment practices complained of above were malicious or recklessly indifferent to Plaintiff's rights as protected by Federal law, and by its conduct Defendant is subject to punitive damages.

51. As a result of Defendant's acts and omissions, Plaintiff has in the past and will in the future suffer damages including, but not limited to, mental and emotional distress; fear; anguish; humiliation; embarrassment; lost enjoyment of life; lost wages, benefits, front pay, and other emoluments of employment.

COUNTS VII AND VIII

RACE DISCRIMINATION-HOSTILE WORK ENVIRONMENT

42 U.S.C. §§2000(e) et seq. and Neb. Rev. Stat. §48-1004

52. Plaintiff hereby incorporates paragraphs 1 through 51 as if fully set forth herein and states:

53. Defendant discriminated against Plaintiff with respect to her employment on the basis of her race in violation of the Title VII and the NEFEPA by subjecting her to a hostile work environment caused by the conduct of her supervisor, including but not limited to Hicks's derogatory and demeaning comments about Plaintiff's race and the race of other employees.

54. Hicks' conduct was unwelcome.

55. Hicks' conduct was based on Plaintiff's race.

56. Hicks' conduct was sufficiently severe or pervasive that a reasonable person in the plaintiff's position would find the plaintiff's work environment to be hostile.

57. At the time such conduct occurred and as a result of such conduct, Plaintiff believed her work environment to be hostile.

58. As a result of Defendant's acts and omissions, Plaintiff has in the past and will in the future suffer damages including, but not limited to, mental and emotional distress; fear; anguish; humiliation; embarrassment; lost enjoyment of life; lost wages, benefits, front pay, and other emoluments of employment.

COUNT IX

RACE DISCRIMINATION

42 U.S.C. § 1981

59. Plaintiff hereby incorporates by reference paragraphs 1 through 58 and states:

60. Defendant discriminated against Plaintiff on the basis of her race in violation of 42 U.S.C. § 1981 by subjecting her to disparate treatment in the terms, privileges and conditions of her employment.

61. Plaintiff suffered adverse action, including but not limited to unequal pay, unfavorable work assignments, discipline and termination of employment.

62. Plaintiff's race was a motivating factor in the decision-making regarding Plaintiff's terms and conditions of employment.

63. The unlawful employment practices complained of above were malicious or recklessly indifferent to Plaintiff's rights as protected by Federal law, and by its conduct Defendant is subject to punitive damages.

64. As a result of Defendant's acts and omissions, Plaintiff has in the past and will in the future suffer damages including, but not limited to, mental and emotional distress; fear; anguish; humiliation; embarrassment; lost enjoyment of life; lost wages, benefits, front pay, and other emoluments of employment.

COUNTS X AND XI

RETALIATION

42 U.S.C. §2000e-3 and Neb. Rev. Stat. §48-1114(1)(a)

65. Plaintiff hereby incorporates paragraphs 1 through 64 as if fully set forth herein and states:

66. During her employment, Plaintiff engaged in protected activity, including but not limited to exercising her rights under Title VII and NEFEPA by internally complaining of sex and race discrimination, internally opposing sex discrimination and participating in an internal investigation related to sex and race discrimination.

67. Defendant took adverse employment action against Plaintiff, including but not limited to subjecting her to harassment, unfavorable work schedules and assignments, unequal pay, discipline, termination of employment and failure to hire her for subsequent positions.

68. There is a causal connection between Plaintiff's participation in protected activity and Defendant's adverse action against her.

69. The unlawful employment practices complained of above were malicious or recklessly indifferent to Plaintiff's rights as protected by Federal law, and by its conduct Defendant is subject to punitive damages.

70. As a result of Defendant's retaliation, Plaintiff has in the past and will in the future suffer injuries and damages, including, but not limited to mental and emotional distress; humiliation; fear, embarrassment; lost enjoyment of life; lost wages and benefits; front pay and other emoluments of employment.

COUNT XII

WHISTLEBLOWER RETALIATION

Neb. Rev. Stat. §48-1114(1)(c)

71. Plaintiff hereby incorporates paragraphs 1 through 70 as if fully set forth herein and states:

72. During her employment, Plaintiff engaged in protected activity, including but not limited to opposing and reporting illegal practices, including but not limited to reporting a coworker being allowed to work while intoxicated in violation of OSHA, state and internal safety rules and reporting a sexual assault of another coworker in violation of state law.

73. Defendant took adverse employment action against Plaintiff, including but not limited to subjecting her to harassment, unfavorable work schedules and assignments, unequal pay, discipline, termination of employment and failure to rehire for subsequent positions.

74. There is a causal connection between Plaintiff's participation in protected whistleblower activity and Defendant's adverse action against her.

75. As a result of Defendant's retaliation, Plaintiff has in the past and will in the future suffer injuries and damages, including, but not limited to mental and emotional distress; humiliation; fear, embarrassment; lost enjoyment of life; lost wages and benefits; front pay and other emoluments of employment.

COUNT XIII

WRONGFUL TERMINATION IN VIOLATION OF PUBLIC POLICY

Nebraska Common Law-Workers' Compensation Retaliation

76. Plaintiff hereby incorporates by reference paragraphs 1 through 75 and states:

77. During her employment, Plaintiff participated in one or more protected activities arising under Nebraska Workers' Compensation Statutes, including but not limited to making a claim for worker's compensation benefits payable by Defendant.

78. Within two weeks, Defendant terminated Plaintiff's employment and did not subsequently rehire her for jobs positions she was qualified to hold.

79. A causal link existed between Plaintiff's termination and her participation in said protected activities.

80. As a result of Defendant's retaliatory discharge, Plaintiff has suffered damages in the form of lost wages and benefits, loss of future pay and benefits, emotional pain and suffering, inconvenience, mental anguish, and loss of enjoyment of life. Plaintiff has incurred, and will continue to incur, attorney's fees and costs in this matter.

DAMAGES

81. Plaintiff hereby incorporates by reference paragraphs 1 through 80 and states:

82. As a result of Defendant's discrimination, retaliation and other wrongful conduct, Plaintiff has suffered damages and seeks the following relief:

- a. Back pay and lost benefits to the time of trial;
- b. Front pay including retirement and other benefits;
- c. Compensatory damages for future pecuniary losses, emotional pain, suffering, inconvenience, mental anguish, loss of enjoyment of life, and other nonpecuniary losses;
- d. Punitive damages under Federal law;
- e. Attorney's fees, expert witness fees and other reasonable costs; and,
- f. Pre-judgment and post judgment interest.

WHEREFORE, Plaintiff demands judgment against Defendant in an amount which will fully and fairly compensate her for her injuries and damages, for all her general, special and punitive damages, for costs, attorney's fees, interest and for such other relief as just and equitable.

Plaintiff demands a trial by jury.

Dated: March 21, 2021.

ANGELA FINGER, Plaintiff

BY: s/ Jennifer Turco Meyer
Jennifer Turco Meyer, #23760
Of Dyer Law, P.C., LLO
2611 S. 117th Street
Omaha, Nebraska 68144
(402) 393-7529
(402) 391-2289 facsimile
Jennifer@dyerlaw.com
Attorney for Plaintiff

Filed in Washington District Court

*** EFILED ***

Case Number: D29CI210000058

Transaction ID: 0013015138

Filing Date: 03/24/2021 02:15:58 PM CDT

IN THE DISTRICT COURT OF WASHINGTON COUNTY, NEBRASKA

ANGELA FINGER,

Plaintiff,

vs.

BILFINGER INC.,

Defendant.

Case No. CI21-58

PRAECIPE

TO THE CLERK OF SAID COURT:

PLEASE ISSUE Summons with a copy of the Complaint in the above-entitled matter and deliver the same to attorney for the Plaintiff for service upon the Defendant via certified mail, return receipt requested, to the following address:

Bilfinger Inc.
by and through their Registered Agent
C T Corporation System
5601 South 59th Street, Suite C
Lincoln, NE 68516

DATED this 24th day of March, 2021.

ANGELA FINGER, Plaintiff

BY: s/ Jennifer Turco Meyer
Jennifer Turco Meyer, #23760
Of Dyer Law, P.C., LLO
2611 S. 117th Street
Omaha, Nebraska 68144
(402) 393-7529
(402) 391-2289 facsimile
Jennifer@dyerlaw.com
Attorney for Plaintiff

Image ID:
D00022780D29

SUMMONS

Doc. No. 22780

IN THE DISTRICT COURT OF Washington COUNTY, NEBRASKA
PO Box 431
Blair NE 68008 0431

Angela Finger v. Bilfinger, Inc.

Case ID: CI 21 58

TO: Bilfinger, Inc.

FILED BY
Clerk of the Washington District Court
03/24/2021

You have been sued by the following plaintiff(s):

Angela Finger

Plaintiff's Attorney: Jennifer L Meyer
Address: 2611 S 117th Street
Omaha, NE 68144

Telephone: (402) 393-7529

A copy of the complaint/petition is attached. To defend this lawsuit, an appropriate response must be served on the parties and filed with the office of the clerk of the court within 30 days of service of the complaint/petition. If you fail to respond, the court may enter judgment for the relief demanded in the complaint/petition.

Date: MARCH 24, 2021

BY THE COURT:

Susan K. Paulsen
Clerk



PLAINTIFF'S DIRECTIONS FOR SERVICE OF SUMMONS AND A COPY OF THE COMPLAINT/PETITION ON:

Bilfinger, Inc.
Register Agent CT Corp System
5601 South 59th Street, Suite C
Lincoln, NE 68516

Method of service: Certified Mail

You are directed to make such service within ten days after the date of issue, and file with the court clerk proof of service within ten days after the signed receipt is received or is available electronically, whichever occurs first.

SERVICE RETURN

Doc. No. 22780

Washington District Court
 PO Box 431
 Blair NE 68008 0431

To:

Case ID: CI 21 58 Angela Finger v. Bilfinger, Inc.

Received this Summons on _____, I hereby certify that on
 _____ at _____ o'clock __M. I served copies of the Summons
 upon the party:

by _____

as required by Nebraska state law.

Service and return \$ _____

Copy _____

Mileage _____ miles

TOTAL \$ _____

Date: _____ BY: _____
 (Sheriff or authorized person)

**CERTIFIED MAIL
 PROOF OF SERVICE**

Copies of the Summons were mailed by certified mail,
 TO THE PARTY: _____

At the following address: _____

on the _____ day of _____, as required by Nebraska state law.

Postage \$ _____ Attorney for: _____

The return receipt for mailing to the party was signed on _____.

To: Bilfinger, Inc.
 Register Agent CT Corp System
 5601 South 59th Street, Suite C
 Lincoln, NE 68516

From: Jennifer L Meyer
 2611 S 117th Street
 Omaha, NE 68144

ATTACH RETURN RECEIPT & RETURN TO COURT

Filed in Washington District Court

*** EFILED ***

Case Number: D29CI210000058

Transaction ID: 0013159006

Filing Date: 04/13/2021 09:53:32 AM CDT

SERVICE RETURN

Washington District Court
 PO Box 431
 Blair NE 68008 0431

To:

Case ID: CI 21 58 Angela Finger v. Bilfinger, Inc.

Received this Summons on _____, _____. I hereby certify that on
 _____, _____ at _____ o'clock ____ M. I served copies of the Summons
 upon the party:

 by _____

as required by Nebraska state law.

Service and return \$ _____

Copy _____

Mileage _____ miles _____

TOTAL \$ _____

Date: _____ BY: _____
 (Sheriff or authorized person)

CERTIFIED MAIL PROOF OF SERVICE

Copies of the Summons were mailed by certified mail,
 TO THE PARTY: Bilfinger Inc.

At the following address: by and through their Registered Agent, C T Corporation System,
5601 South 59th Street, Suite C, Lincoln, NE 68516

on the 25th day of March, 2021, as required by Nebraska state law.

Postage \$ 8.05 Attorney for: Angela Finger, Plaintiff

The return receipt for mailing to the party was signed on March 29, 2021, _____.

To: Bilfinger, Inc.
 Register Agent CT Corp System
 5601 South 59th Street, Suite C
 Lincoln, NE 68516

From: Jennifer L Meyer
 2611 S 117th Street
 Omaha, NE 68144

ATTACH RETURN RECEIPT & RETURN TO COURT

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

CT Corporation System, Registered
Agent for Bilfinger, Inc.
5601 S. 59th St, Ste C
Lincoln NE 68516



9590 9402 6173 0220 1411 99

2. Article Number (Transfer from service label)

7020 2450 0001 5119 1587

COMPLETE THIS SECTION ON DELIVERY

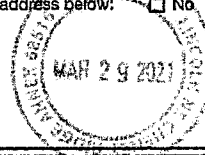
A. Signature

X John Holbrook ☐ Agent
☐ Addressee

B. Registered by (Print Name)

John Holbrook C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No



3. Service Type

- | | |
|--|---|
| <input type="checkbox"/> Adult Signature | <input type="checkbox"/> Priority Mail Express® |
| <input type="checkbox"/> Adult Signature Restricted Delivery | <input type="checkbox"/> Registered Mail™ |
| <input checked="" type="checkbox"/> Certified Mail® | <input type="checkbox"/> Registered Mail Restricted Delivery |
| <input type="checkbox"/> Certified Mail Restricted Delivery | <input type="checkbox"/> Signature Confirmation™ |
| <input type="checkbox"/> Collect on Delivery | <input type="checkbox"/> Signature Confirmation Restricted Delivery |
| <input type="checkbox"/> Collect on Delivery Restricted Delivery | |
| <input type="checkbox"/> Insured Mail | |
| <input type="checkbox"/> Insured Mail Restricted Delivery | |

Image ID:
D00022780D29

SUMMONS

Doc. No. 22780

IN THE DISTRICT COURT OF Washington COUNTY, NEBRASKA
PO Box 431
Blair NE 68008 0431

Angela Finger v. Bilfinger, Inc.

Case ID: CI 21 58

TO: Bilfinger, Inc.

You have been sued by the following plaintiff(s):

Angela Finger

Plaintiff's Attorney: Jennifer L Meyer
Address: 2611 S 117th Street
Omaha, NE 68144

Telephone: (402) 393-7529

A copy of the complaint/petition is attached. To defend this lawsuit, an appropriate response must be served on the parties and filed with the office of the clerk of the court within 30 days of service of the complaint/petition. If you fail to respond, the court may enter judgment for the relief demanded in the complaint/petition.

Date: MARCH 24, 2021

BY THE COURT:

Susan K. Paulsen
Clerk



PLAINTIFF'S DIRECTIONS FOR SERVICE OF SUMMONS AND A COPY OF THE COMPLAINT/PETITION ON:

Bilfinger, Inc.
Register Agent CT Corp System
5601 South 59th Street, Suite C
Lincoln, NE 68516

Method of service: Certified Mail

You are directed to make such service within ten days after the date of issue, and file with the court clerk proof of service within ten days after the signed receipt is received or is available electronically, whichever occurs first.

Certificate of Service

I hereby certify that on Tuesday, April 13, 2021 I provided a true and correct copy of the Return-Summons/Alias Summons to the following:

Bilfinger, Inc. service method: No Service

Signature: /s/ Jennifer Turco Meyer (Bar Number: 23760)

(No. 706 Single)

CERTIFICATE OF TRANSCRIPT

STATE OF NEBRASKA
COUNTY OF WASHINGTON } ss.

IN THE DISTRICT COURT OF

WASHINGTON COUNTY, NEBRASKA.

I, Susan K Paulsen

Clerk of the District Court,

within and for the County aforesaid, do hereby certify that the foregoing is a full, true and correct copy of Certified Copy of CI 21 58

Angela Finger

vs

Bilfinger Inc.

Complaint

Praecipe

Summons

Service Return

as the same appears from the records of said Court.

WITNESS my hand and official seal

this 14th day of April 20 21


Clerk District Court.

Case No. _____

Certificate of Transcript

DISTRICT COURT

_____ County

STATE OF NEBRASKA

Plaintiff

VS.

Defendant

ATTORNEYS

Plaintiff

Defendant

706 SINGLE—CERTIFICATE OF TRANSCRIPT—REDFIELD & COMPANY, OMAHA